

# Cooley

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By ECF

April 21, 2021

Hon. George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Eyobe Amberber v. EHANG Holdings Limited et al.*, Case No. 1:21-cv-01392-GBD and *Vivian Chaumont v. EHANG Holdings Limited et al.*, Case No. 1:21-cv-01526-GBD Request for Extension and Adjournment**

Dear Judge Daniels:

We represent Defendant EHANG Holdings Limited (“Defendant”) and write with the consent of plaintiffs in the above-referenced matters. Pursuant to Section II.C of the Court’s Individual Rules and Practices, and in light of the procedural matters ongoing pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A)(i), we request an extension of time for Defendant to respond to plaintiff Amberber’s complaint and an adjournment of the initial pretrial conference for the above-referenced related matters.

Plaintiff Amberber initiated Case No. 1:21-cv-01392-GBD in this Court by filing a securities class action (the “Initial Complaint,” ECF No. 1) against Defendant and certain individuals on February 17, 2021. On February 19, 2021, plaintiff Chaumont initiated a similar action in this Court, Case No. 1:21-cv-01526-GBD. These two cases were accepted as related on March 19, 2021. Further, on February 26, 2021, plaintiff Ran Klein initiated a similar action in the Central District of California (Case No. 2:21-cv-01811-JFW-PVC).

Under the PSLRA, not later than sixty days after public notice of the filing of the Initial Complaint, members of the putative class were entitled to move the Court to serve as lead plaintiff. Notice was published on February 17, 2021 and the deadline to seek appointment as lead plaintiff was April 19, 2021. Eleven motions for lead plaintiff were filed on the deadline, including motions by counsel who represent all three of the plaintiffs who initiated the pending actions (although no original plaintiff has moved for lead plaintiff). Eleven motions for consolidation were also filed. The PSLRA provides that the Court shall consider motions to appoint a lead plaintiff no later than 90 days after the notice has been published. 15 U.S.C. § 78u-4(a)(3)(B)(i). The Court must render a

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decision on the consolidation motions before appointing a lead plaintiff. 15 U.S.C. § 78u-4(a)(3)(B)(ii).

On February 22, 2021, this Court scheduled an initial pretrial conference for May 4, 2021. On March 3, 2021, Plaintiff Amberber filed an affidavit of process server indicating that Defendant was served with the Initial Complaint on February 25, 2021, causing the docket to reflect that Defendant's response is due April 26, 2021 (Case No. 1:21-cv-01392-GBD, ECF No. 7).

Defendant submits this letter to request (1) an extension, without date, to respond to Plaintiff Amberber's complaint and (2) an adjournment, without date, of the initial pretrial conference for the above-referenced related matters. These requests are to allow time for the Court to consolidate related cases, to transfer cases as necessary, and to consider the various motions for lead plaintiff pursuant to the PSLRA.

There have been no prior requests for an extension of time in these actions. Counsel for Plaintiffs Amberber and Chaumont (copied here) have consented to these requests.

A Stipulation and proposed Amended Civil Case Scheduling Order and Management Plan is attached to this letter.

Dated: April 21, 2021

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